



**Technical Meeting Agenda  
Area 9/10  
Southeast Rockford Groundwater Contamination Superfund Site  
October 17, 2007, 10:00 AM**

Attendees

Russ Hart, U.S. EPA  
Tom Williams, Illinois EPA  
Scott Moyer, UTC  
Keith Wilcoxson, SECOR  
John Dennison, SECOR

Agenda

- 1) Introductions
- 2) Loading dock hotspot delineation/excavation
- 3) RCRA SWMU documentation/closure
- 4) 2000 LUST Incident closure
- 5) Potential for UST removal and closure

**Lunch Break**

- 6) GMZ boundaries – horizontal and vertical
- 7) Outside Container Storage Area (OSA)
  - Risk-based source removal
  - Public & RR rights-of way
  - HRC-X endpoint
- 8) Soil and groundwater endpoints
  - Contingent provisions of the ROD
  - Potential of MNA as long-term remedial method
- 9) JP-4 area remediation and endpoints
- 10) Adjourn

**Technical Meeting Supporting Information**  
**Area 9/10**  
**Southeast Rockford Groundwater Contamination Superfund Site**  
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Historical perspective from Records of Decision (RODs) regarding natural attenuation to augment the source removal remedies and the use of monitored natural attenuation as an integral portion of the remedy and means to assess the effectiveness of the remedies.

**Operable Unit Two (OU 02), September 29, 1995**

Section: Declaration of the Record of Decision

Subsection: Description of the Remedy

The selected remedial action addresses groundwater contamination as defined in the Remedial Investigation. The function of this action will be to rapidly eliminate current and potential human exposures to groundwater contaminants originating mainly from four identified source areas of groundwater contamination. As further control of the four identified major source areas is assumed in this groundwater remedy, the degree and time to which groundwater in this aquifer is restored will be dependant on the extent to which source areas are remediated in the future.

Section: Concerns about Long Term Monitoring and Computer Modeling

Response: The Illinois EPA and USEPA conclude that 205 years is an appropriate time frame for projected monitoring. The Record of Decision designates that the groundwater will be treated by natural attenuation. Natural attenuation refers to the process by which contamination in groundwater is reduced by natural breakdown of compounds, dilution and other natural processes. Results from modeling (predicting) normal breakdown of volatile organic chemicals in groundwater (i.e., in the absence of air and sunlight) show that it would take at least 205 years for the chemicals at the concentrations found in the most highly contaminated areas of the site to break down into harmless products, assuming a remedy for the source areas.

**Operable Unit Three (OU 03), June 11, 2002**

Section: Selected Remedy

Subsection: Groundwater Management Zones (GMZ)

It is the intention of the proposed remedies in this ROD to meet the desired goals of Class I Groundwater Standards for the source areas, as well as the entire Southeast Rockford Area. However, due to continuing migration of contaminated groundwater below the entire site, exceedences of the Class I Groundwater quality may occur beyond GMZ boundaries until such time that the proposed remedies are fully operational and functional. Part of the proposed remedy is natural attenuation of already-contaminated groundwater beyond the source areas, however, to achieve this, adjustments shall be made for compliance with Groundwater Quality Standards, in accordance with 35 Ill. Adm. Code Part 620. The Illinois EPA acknowledges that the groundwater will not meet Class I Groundwater Standards until enough natural degradation of contamination occurs. Natural attenuation is a major part of the remedy proposed for the overall remediation of the entire site. Groundwater monitoring would be carried out during the entire remediation process to assess the effectiveness of the remedies proposed in the ROD. Pursuant to 35 Ill. Adm. Code 620.250(c), "The Agency shall review the on-going adequacy of controls and continued management at the site if concentrations of chemical constituents, as specified in Section 620.250 (a) (4) (B), remain in groundwater at the site following completion of such action. The review must take place no less than every five years." This part of Illinois regulations is concurrent with the policies of the CERCLA and the NCP that will allow the Illinois EPA the opportunity to adjust remediation activities to meet the desired remediation goals.